

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS**

DEBORAH ANN COLLINS, individually :
and on behalf of all others similarly : CIVIL ACTION FILE NO. 4:25-cv-88
situated, :
: **COMPLAINT – CLASS ACTION**
Plaintiff, :
: **JURY TRIAL DEMANDED**
v. :
: FALAYA, LLC :
: Defendant. :
/

DECLARATION OF DEBORAH ANN COLLINS

1. My name is Deborah Ann Collins. I am over 18 years old. I can testify competently to the undersigned statements.
2. This Declaration is being made under the penalty of perjury pursuant to 28 U.S.C. § 1746.
3. I make this Declaration in opposition to the Defendant's motion to dismiss for improper venue.
4. I am the Plaintiff in this lawsuit.
5. My telephone number 303-XXX-XXXX is a cellular telephone number.
6. I am the user of 303-XXX-XXXX.
7. The 303-XXX-XXXX number is registered in my name and I am the subscriber of record.
8. The property referenced in the subject text messages I received from the Defendant is a property that I managed in Frisco Texas. This was a rental home in Frisco, Texas that was an asset within my self-directed IRA.

9. I had previously listed the property on the MLS through a realtor, but the listing expired.

10. As such, Defendant was attempting to seek to re-list my property in Frisco, Texas, which lies within this District.

11. I did not ask for or request calls from Defendant, including to relist the property in Frisco. In other words, Defendant chose to solicit me for my Frisco property by itself and without any prompting from me and despite my number being on the National Do Not Call Registry.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 15th day of April 2025, in the United States of America,



Deborah Ann Collins